

December 20, 1990

CD-90-07

Dear Independent Commercial Importer:

SUBJECT: Alternative Method of Computer Processing for Carryover
of Previous Year Certification Data

This letter introduces an alternative computer processing procedure to be used when an Independent Commercial Importer (ICI) employs carryover to satisfy the current model year certification data requirements. The use of prior model year exhaust and/or evaporative emission data to satisfy current model year emissions data requirements is allowed under the provisions of 40 CFR 86.090-24(f). Advisory Circular No. 17F sets forth EPA's policy regarding the use of data from previous model year certification vehicles. In addition, A/C No. 17F sets forth EPA's policy concerning carryover of emission data when new emission standards are introduced. Paragraph V.A.4.h provides that carryover emission data normally will be accepted if the previous model year emission-data vehicle had emission test results which would comply with the current (new) standards after the applicable deterioration factors have been applied.

The alternative processing procedure for carryover of certification data for an engine family may only be used by an ICI under the following conditions:

- 1) The ICI has not made any changes to the vehicles or in the vehicles' engine or emission control systems since the previous model year certification, and
- 2) The evaporative emission control system, including family name, being used in the current model year certification is the same as the previous model year.
- 3) For the 1992 and later model years, the vehicles emission control systems (and fuel metering systems) must qualify as proven emission control systems. The definition of proven emission control systems is contained in 40 CFR 85.092-2.

The ICI must obtain prior EPA approval to use this alternative processing procedure.

The use of the alternative procedure for carryover is appropriate,

provided the above requirements are met, in the case where an ICI
submits a new model year Application for
AFMC:COLE:x444:lm:x467:2565 Plymouth Rd:12/19/90:CPSB#3597w

Certification covering a vehicle which has been previously certified. For example, an ICI satisfactorily completed certification of a 1989 original production year vehicle model for the 1990 model year. Should that ICI desire to certify the same 1989 original production vehicle model in the 1991 model year, it may do so by carrying over the emission data used to support the 1990 model year certificate. In using carryover, the ICI does not have to test additional emission-data vehicles, thereby reducing the ICI's cost for 1991 model year certification of that engine family.

The alternative procedure reduces the number of computer data input forms the ICI must submit during the carryover certification process from four to one. The new data form eliminates the following four data forms: 1) Engine System Information, 2) Carline System Information, 3) Vehicle Information, and 4) Summary Sheet Information. These forms are replaced by one form called the Independent Commercial Importers (ICI) Carryover form. Information and instructions on filling out and processing the Independent Commercial Importers (ICI) Carryover form (1201W) and a copy of the form are enclosed.

This new ICI Carryover Data Input Form only reduces the number of computer input forms needed for carryover and does not change any other requirements applicable to the certification of an engine family using emission-data carryover. An ICI will still need to acquire small-volume manufacturer (ICI) status each certification model year and submit a complete application for a Certificate of Conformity for the engine family. In addition, the alternative procedure for certification based on emission data carryover is not applicable to initial certification or carryover certification that does not qualify for the alternative procedure. For engine families that do not qualify for the alternative procedure, the ICI must still submit the following four computer data input forms: 1) Engine System Information, 2) Carline System Information, 3) Vehicle Information, and 4) Summary Sheet Information.

Should you have any questions on using this data input form, please contact your certification representative.

Sincerely yours,

Robert E. Maxwell, Director
Certification Division

Enclosures

3597w

Attachment 1

Alternative Procedure for ICI Carryover

The alternative procedure reduces the number of computer data input forms the ICI must submit during the alternative procedure carryover certification process from four to one. The new data form, copy attached, eliminates the need to submit the following four data forms: 1) Engine System Information, 2) Carline System Information, 3) Vehicle Information, and 4) Summary Sheet Information. These forms are replaced by one form called the Independent Commercial Importers (ICI) Carryover form (1201W, Copy attached).

There are five entries on the ICI Carryover form, they are: 1) Card Number, 2) Manufacturer Code, 3) Engine Family Name to be Carried Over, 4) New Model Year, and 5) New Engine Family Name. When completing the entries on the ICI Carryover form the Manufacturer Code, Engine Family Name to be Carried Over, and New Model Year must be completed. The Card Number has already been completed and the New Engine Family Name is optional. By leaving the new engine family name blank the computer will determine and assign the correct engine family name. The data entered on the ICI Carryover data input form is used to access the previous model year data in the light-duty computer system. This key information allows retrieval of the necessary information to complete the carryover transactions. Should any errors occur on the ICI carryover data input form, no processing will be attempted. Errors which will stop processing are invalid manufacturer code, invalid engine family name to be carried over, invalid new model year, invalid new engine family name, or the engine family being carried over was never certified.

The ICI should submit a completed ICI Carryover form 1201W to the certification representative for processing. The new ICI carryover data system is designed to operate only when the carryover request is submitted by the certification representative to the EPA computer room window. Therefore, the ICI Carryover data input form cannot be submitted by the ICI to the EPA computer room window or by electronic means. Upon processing of the reports, the information will be returned only to the certification representative.

The input form may be submitted to the certification representative for processing prior to submitting an application for a Certificate of Conformity. Upon completion of the data

processing, a copy of the output (i.e., current model year Summary Sheet Report) will be sent to the ICI.

3528w

AFMC:COLE:x444:lm:x467:2565 Plymouth Rd:11/27/90:CPSB#3528w

REFER TO CD9007.PCX FOR DATA SHEET